

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New
Mexico corporation sole,

Case No. 18-13027-t11

Debtor.

**MOTION TO APPROVE STIPULATED ORDER GRANTING AND CONDITIONING
RELIEF FROM STAY BETWEEN DEBTOR AND DEFENDANT J.W.**

Defendant J.W., by counsel and pursuant to Bankruptcy Rule 4001(d)(1), respectfully moves this Court to approve the Stipulated Order Granting and Conditioning Relief from Stay between Debtor and J.W. (the “Stipulated Order”) a copy of which is attached to this motion as Exhibit A. In support of this Motion, Claimant states as follows:

1. On December 3, 2018, The Archdiocese of Santa Fe filed for protection under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court, District of New Mexico.
2. Defendant is party in interest in this case.
3. The Court has jurisdiction over the parties and the subject matter herein.
4. Defendant and Debtor have agreed to the Stipulated Order, which in summary, lifts the 11 U.S.C. § 362(a) stay, that went into effect with the filing of this Chapter 11 action, in Case No, D-202-CV-2018-07481, Second Judicial District Court, Bernalillo County, New Mexico (the “State Court”), for the limited purpose of allowing Defendant’s Unopposed Order to Reform the Complaint and Seal the Record (attached as redacted Exhibit B), to be entered.
5. Cause exists to grant relief from the stay as provided in the Stipulated Order.

6. Defendant shall give notice of this motion to all those entitled to notice pursuant to Bankruptcy Rule of Procedure 4001(d), with a 14-day opportunity to object, plus 3 days for service, along with a copy of this Motion and the Stipulated Order.

WHEREFORE, Claimant requests that the Court approve the Stipulated Order and grant such other relief as is just.

Respectfully submitted,

CURTIS & LUCERO

By: Laura R. Callanan (filed elect. 3/5/19)

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I hereby certify that on March 5, 2019 a copy of the foregoing, along with the Motion and the Stipulated Order, was mailed by U.S. Mail and to Debtor Archdiocese of Santa Fe, Thomas D. Walker, Esq., Walker & Associates, P.C., 500 Marquette Ave NW, Suite 650, Albuquerque, NM 87102, and in accordance with NM LBR 9036-1 and Fed. R. Civ. P. Rule 5(b)(3), was served via the Court's CM/ECF notification facilities to those parties who are registered CM/ECF participants in this case.

Laura R. Callanan, Esq. (filed elect. 3/5/19)
Laura R. Callanan, Esq.